



November 10, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Sent by email to ceqa.guidelines@opr.ca.gov

Dear Mr. Calfee,

I'm writing to comment on your agency's draft of new guidelines to implement SB 743. Thank you for the extended opportunity to comment.

We are excited about the new guidelines because elimination of automobile congestion as a measure of environmental impact is essential to meeting California's environmental goals. Current CEQA practice has the perverse effect of encouraging faster automobile travel at the expense of bicycle safety. In fact, removal of a mixed travel lane to install a bicycle lane may be considered to have a significant impact on the environment and trigger an extensive review, while the removal of the bike lane to add a mixed travel lane would not.

Increasing bicycling is an official goal of the state of California, as enshrined in the creation of the Active Transportation Program. More bicycling is also an important environmental goal that should be supported by environmental analysis and regulations. Cities that enable bicycling by creating dedicated and protected space for safe riding will experience an increase in riding which in turn improves the health of residents.¹ By contrast, policies that work to mitigate congestion by facilitating car traffic will decrease bicycling, and could explain why decreased in most counties in California from 1980 to 2000.²

Therefore, we strongly support the draft guidelines that steer environmental analysis in a direction that will improve public health and the environment. We have already stated our strong support for using vehicle miles traveled as the replacement measure for automobile congestion. With this letter we reaffirm that support. Also, we urge you to keep the following elements of the guidelines intact in the final version and make some comments and recommendations for improvements.

1. Please maintain the requirement to analyze impacts on bicycle safety. A development or transportation project that might not be considered to have a significant impact with regard to vehicle miles traveled could in fact have a deleterious impact on public health and the

¹ "Bicycle-friendly city infrastructure in U.S. significantly increases cycling to work by residents, which can improve health of locals" Obesity Society study, November 3, 2014.

² United States Census data on journey to work shows decreases in bicycling in most California counties from 1990 to 2000, and decreases in the use of "other" modes of transportation from 1980 to 1990. ("Bicycle" was not measured in the 1980 Census.)

environment if bicycle safety is negatively impacted. For example, a project that installed a transit lane at the expense of a bike lane may not increase vehicle miles traveled, but it would have a significant impact on bike safety that should be carefully analyzed and mitigated to the greatest extent possible. A development project located in a dense urban area with a well-below-average contribution to vehicle miles traveled could be devastating to bicycle travel if its garage entrance, however small, is designed to create conflict with bicycle travel. These kinds of impacts will be more likely avoided if the final draft guidelines include a provision to consider impacts to bicycle safety to be a serious impact.

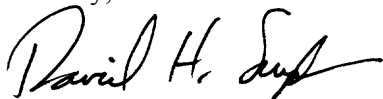
It is worth noting that the example in the previous paragraphs are obvious specific situations and that less obvious situations may also require analysis. For example, a class 3 bike route may degrade from a high quality route to a poor one if a project increases traffic on that street. Such analysis need not be burdensome to project proponents and environmental staff. Methodology to evaluate the “level of traffic stress” of a street is relatively new but very simple to apply and quickly becoming commonplace.³

2. Please keep the references to enabling more bicycling in the list of mitigation measures in Appendix F. While we don’t question the importance of electric vehicles, we do question whether encouraging the use of electric *vehicles* has anything to do with reducing *vehicle* miles traveled.
3. Apply the new guidelines to the whole state, not just the transit priority areas. The proposed phasing is acceptable, except that the proposal should encourage a regional agency with a number of transit priority areas to adopt the new guidelines in its entire region, not just in transit priority areas, for consistency’s sake.

Overall, we strongly support the direction you’re going with these new guidelines. If adopted in final form, environmental analysis will improve to support health, safety, and prosperity in our communities.

Please feel free to call me with any questions you have about these recommendations.

Sincerely,



Dave Snyder
Executive Director

³ “Low-Stress Bicycling and Network Connectivity,” Mineta Transportation Institute Report 11-19, May 2012.